1 2 3 4 5 6 7 8	Constantine P. Economides (pro hac vice) (Florida Bar No. 118177) Brianna K. Pierce (CA Bar No. 336906) FREEDMAN NORMAND FRIEDLAND LLP 1 SE 3rd Avenue, Suite 1240 Miami, FL 33131 Tel: (305) 851-5997 Email: ceconomides@fnf.law	CT OF CALIFORNIA	
10	YUTING CHEN,	Case No. 5:21-cv-09393-NC	
11	Plaintiff,		
12	v.	NOTICE OF FILING ORDER	
13	ARIEL ABITTAN, et. al.,	GRANTING ISSUE SANCTIONS AGAINST LILY CHAO, DAMIEN	
14	Defendants.	DING, AND TEMUJIN LABS INC.	
15	ARIEL ABITTAN,	Case No. 5:20-CV-09340-NC	
16	Plaintiff,		
17	v.		
18 19	LILY CHAO (A/K/A TIFFANY CHEN, A/K/A YUTING CHEN), et. al.,		
	Defendants.		
20	Plaintiff Ariel Abittan in Case No. 20-cv-09340-NC and Defendants in Case No. 21-cv-		
21	09393-NC hereby give notice of filing a true and accurate copy of Judge Kulkarni's Order in the		
22 23	related state action, dated May 30, 2023, GRANTING issue sanctions and preventing Lily Chao, Damien Ding, and Temujin Labs Inc. from disputing that:		
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25	1. Ms. Chao and Mr. Ding utilized num		
26	work on behalf of Temujin including but not limited to the following: Lily Chao, Tiffany Chen, Yuting Chen, Tiffany Lily Chen, Yang Rong, Damien Ding, Damien Leung, Tao Ding, Damien Ray Donovan, Damien Ray Donovan Leung, Jianrong Wang, Alex Wang, Yang Yang, and the two Chinese character names reflected at p. 16:4-5 in the memorandum of points and authorities;		
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	NOTICE OF FILING	CASE NO. 5:21-CV-09393-NC	

1 2	2. Ms. Chao and Mr. Ding utilized aliases to sign corporate documents on behalf of Temujin, including investment documents, incorporation documents, and employee contracts; and		
3	3.	Ms. Chao and Mr. Ding disguise	ed their true identities in order to mislead Mr. parties regarding Temujin's business ventures. ¹
4		1 ison and wir. Lu and other time	parties regarding remajin s ousiness ventures.
5	The Order	is attached hereto as Exhibit A,	
6	Dated: Jur	ne 20, 2023	FREEDMAN NORMAND FRIEDLAND LLP
7			/s/ Brianna K. Pierce Brianna Pierce (CA Bar No. 336906)
8			Constantine P. Economides (<i>pro hac vice</i>) 1 SE Third Avenue, Suite 250
9 10			Miami, Florida 33131 Tel: (305) 971-5943 Email: bpierce@fnf.law
11			ceconomides@fnf.law
12			Counsel for Plaintiff Ariel Abittan and the Chen Case Defendants
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27 28	The Court granted Abittan's request to join in Charles Lu and Benjamin Fisch's sanctions motion		
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	LAINIII	FF'S NOTICE OF FILING	CASE NO. 5:20-CV-09340-NC

PLAINTIFF'S NOTICE OF FILING ALTERNATIVE AMENDED COMPLAINT